

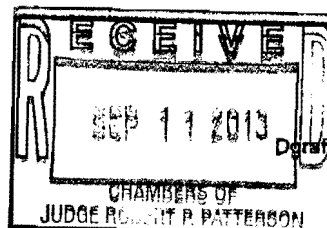
ANDERSON KILL P.C.

Attorneys and Counselors at Law

1251 AVENUE OF THE AMERICAS ■ NEW YORK, NY 10020

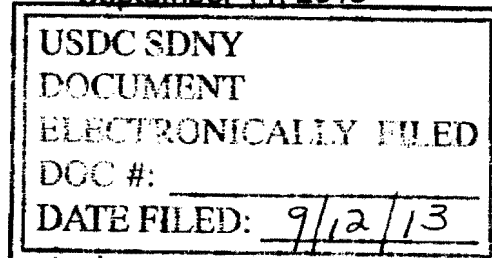
TELEPHONE: 212-278-1000 ■ FAX: 212-278-1733

www.andersonkill.com

MEMO ENDORSEDDavid Graff, Esq.
Dgraft@andersonkill.com
212-278-1333**Via Facsimile (212) 805-7917**

Honorable Robert P. Patterson
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

September 11, 2013



Re: Deutsch et. al. v. ZST Digital Networks, Inc. et. al.
(SDNY Nos. 13-CV-5460 and 13-CV-4571)

Dear Judge Patterson:

We represent Mr. Peter E. Deutsch and the Receiver Robert Seiden in the above captioned matters. Matter 13-cv-5460 is a turnover petition against King & Wood Mallesons for property it holds of the judgment debtor ZST Digital Networks Inc. ("Judgment Debtor" or "ZSTN") and matter 13-cv-4571 is also a turnover petition against Duane Morris LLP for property it holds of the Judgment Debtor.

By letter dated August 15, 2013, we requested that oral argument for both matters be set on the same date and Your Honor granted said request so ordering an oral argument date of September 13, 2013. We now write to formally request an adjournment for the date of oral argument for both matters as: (1) the parties have entered negotiations recently and are making good progress on potential settlement which would render the turnover petitions moot; and, (2) one of the lead attorneys representing Petitioners has fallen extremely ill and will be unable to attend oral argument on September 13, 2013.

It is thus respectfully requested that oral argument for both matters be adjourned from September 13, 2013 until October 4, 2013. The only prior request regarding this hearing date was the August 15, 2013 letter requesting that oral argument be set on the same date for both matters. Further, the adversary consents to said adjournment.

Respectfully submitted,
Anderson Kill P.C.

/s/ David Graff
David Graff, Esq.

New York, NY ■ Ventura, CA ■ Stamford, CT ■ Washington, DC ■ Newark, NJ ■ Philadelphia, PA ■ Burlington, VT

nydocs1-1018178.1

See attached typewritten
Memo Endorsement

appellate court
oral argument adjourned
to 10/4/13 and 11/13/13
9/12/13 so adjourned
to 10/4/13 and 11/13/13

Anderson Kill P.C.

Honorable Robert P. Patterson
September 11, 2013
Page 2

Cc:

Via First Class Mail
ZST Digital Network, Inc.
c/o Corporation Service Company -
2711 Centerville Road, Suite 400
Wilmington, DE 19808

-And-

Via Email
Duane Morris, LLP
Attorneys for Duane Morris and King & Wood Mallesons
jmparks@duanemorris.com
trschnul@duanemorris.com
fmjacobs@duanemorris.com

Case: Deutsch, et al. v. ZST Digital Networks, Inc.
Index No. 13 Civ. 5460 and 13 Civ. 4571 (RPP)

MEMO ENDORSEMENTS READ:

Application granted.

Oral argument adjourned to 10/4/13 at 4 PM.

So ordered.

Robert P. Patterson, Jr., U.S.D.J., 9/12/13